

TREVOR J. HATFIELD, ESQ.
Nevada Bar No. 7373
HATFIELD & ASSOCIATES, LTD.
703 South Eighth Street
Las Vegas, Nevada 89101
(702) 388-4469 Tel.
(702) 386-9825 Fax
thatfield@hatfieldlawassociates.com

Attorney for Plaintiff

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

DAHLIA DWEDAR, an individual,

Plaintiff,

vs.

STATE OF NEVADA EX REL. BOARD OF
REGENTS OF THE NEVADA SYSTEM OF
HIGHER EDUCATION, ON BEHALF OF THE
UNIVERSITY OF NEVADA, RENO,

Defendant.

CASE NO:

COMPLAINT

(Jury Trial Demanded)

COMES NOW, Plaintiff DAHLIA DWEDAR (hereinafter, "Plaintiff"), by and through her counsel, of the law firm of Hatfield & Associates, Ltd., and alleges upon information and belief against the above-captioned Defendant as follows:

PARTIES

1. At all times relevant hereto, Plaintiff, residing in Las Vegas, Clark County, Nevada, experienced gender discrimination, disparate treatment and retaliation while employed by Defendant.

2. Plaintiff was an employee of Defendant within the meaning of Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. Sections 2000e, et seq., and applicable case law.

3. Defendant is a University that operates in the State of Nevada.

1 thereafter timely received a perfected Charge of Discrimination with EEOC. Plaintiff has since
2 received his Dismissal And Notice of Rights from EEOC.

3 9. Plaintiff promptly and diligently accommodated all EEOC requests for information
4 and fully cooperated in the agency's investigation of this matter.

5 10. Plaintiff has exhausted all available administrative remedies in accord with the
6 aforementioned statutes prior to instituting this civil action, and Plaintiff has timely filed this action.

7 11. Plaintiff demands a jury trial of this case pursuant to Local Rule 38-1 and 28 U.S.C.
8 Section 1411.

9
10 **FACTUAL ALLEGATIONS**

11 12. Plaintiff is an individual not native to the United States of America. Plaintiff was
12 hired by Defendant in July 2013. Plaintiff's most recent position was Teaching Assistant Professor.
13 Plaintiff performed her duties satisfactorily.

14 13. Plaintiff suffers from a disability. In November 2021, Plaintiff requested to conduct
15 courses remotely to accommodate her disability.

16 14. In March 2022, Defendant denied that request and proposed an alternative that would
17 not accommodate her disability. Defendant did not respond to Plaintiff's request for
18 reconsideration.

19 15. Defendant has permitted similarly situated employees without Plaintiff's disability
20 and of a different national origin to teach courses remotely.

21 16. In March 2022, Plaintiff filed a Title IX discrimination and retaliation complaint
22 against Casilde A. Isabelli (hereinafter "Isabelli").

23 17. In November 2022, Isabelli denied Plaintiff's application for promotion for pretextual
24 reasons.

25
26
27 ///

THIRD CAUSE OF ACTION

(Violation of Nevada Statutory Protections)

27. Plaintiff incorporates by reference the allegations set forth in the preceding paragraphs of the Complaint as though set forth at length herein.

28. NRS § 613.330 makes it unlawful for an employer to discriminate against any employee because of their race, color and national origin. Plaintiff was discriminated against due to her race, color and national origin. Defendant's conduct as detailed herein, was in fact illegal. Plaintiff was subjected to national origin related and motivated discriminatory practices and hostility, and actions all of which are illegal activities as directed, ratified tolerated by her employer.

29. As a direct and proximate result of Defendant's violation of NRS § 613.330, Plaintiff has suffered lost wages, lost benefits, lost seniority, lost future earnings, lost employment opportunities, humiliation, embarrassment, and loss of self-esteem in an amount to be determined at trial. Therefore, Plaintiff seeks all legal and equitable remedies available at law.

30. Plaintiff should be awarded punitive damages as well because of Defendant's extreme and outrageous conduct.

31. As a further result of Defendant's above-stated actions, it has been necessary for Plaintiff to obtain the services of the law offices of Hatfield & Associates, Ltd., to prosecute this action, and Plaintiff is entitled to reimbursement for those attorney's fees and costs which have been reasonably incurred.

FOURTH CAUSE OF ACTION

Retaliation Under the ADAA

32. Plaintiff incorporates by reference the allegations set forth in the preceding paragraphs of the Complaint as though set forth at length herein.

1 33. Defendant refused to interact with Plaintiff and refused to provide Plaintiff with
2 reasonable accommodation for her disability, although Plaintiff was capable of performing her
3 duties if she had been accommodated.

4 34. Defendant continually, intentionally, and in a discriminatory manner refused to
5 accommodate Plaintiff in her position because of her disability.

6 35. Defendant's termination of Plaintiff was not based upon any medical justification or
7 other reasonable reason and were discriminatory as to Plaintiff. Defendant terminated Plaintiff
8 without just cause and because of her disability.

9 36. Such retaliatory adverse employment actions by Defendant were in violation of the
10 ADAA.

11 37. As a result of Defendant's above-stated actions, Plaintiff has suffered irreparable
12 injuries and deprivation of income in the form of wages and prospective benefits, promotion
13 opportunities and job assignments due to her as an employee, and emotional pain and suffering,
14 mental anguish, humiliation, embarrassment, indignity, and other intangible injuries in an amount to
15 be proven at trial.

16 38. Plaintiff should be awarded punitive damages as well because of Defendant's
17 extreme and outrageous conduct.

18 39. As a further result of Defendant's above-stated actions, it has been necessary for
19 Plaintiff to obtain the services of the law offices of Hatfield & Associates, Ltd., to prosecute this
20 action, and Plaintiff is entitled to reimbursement for those attorney's fees and costs which have been
21 reasonably incurred.

22 ///

23 ///

24 ///

REQUEST AND PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for judgment and damages against Defendant as follows:

1. Enter an injunction ordering Defendant to make Plaintiff whole with full back pay, and benefits and reinstatement of sick leave time that Plaintiff would have obtained in the absence of discrimination or, in the alternative, front pay;
2. An award to Plaintiff for compensatory damages in amount to be shown at trial for past and future economic and non-economic losses within this Court's jurisdiction subject to proof;
3. An award to Plaintiff for general damages, including but not limited to emotional distress damages, within this Court's jurisdiction subject to proof;
4. An award to Plaintiff for exemplary and/or punitive damages;
5. An award to Plaintiff for reasonable attorney's fees and costs;
6. An award to Plaintiff for interest on any awards at the highest rate allowed by law;
7. And such other and further relief as this Court deems just and appropriate.

Dated this 17th day of December 2024.

HATFIELD & ASSOCIATES, LTD.

By: /s/ Trevor J. Hatfield
Trevor J. Hatfield, Esq. (SBN 7373)
703 South Eighth Street
Las Vegas, Nevada 89101
(702) 388-4469 Tel.
Attorney for Plaintiff